

October 18, 2000

Honorable Carol M. Browner  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Administrator Browner:

On behalf of the Government Advisory Committee (GAC) to the U.S. Representative to the Commission for Environmental Cooperation (CEC), it is my pleasure to submit to you the following report from our meeting in San Diego, California, on September 7 and 8, 2000. GAC addresses three topics in this letter: 1) assessment of the last CEC meeting in Dallas; 2) general comments on the future direction of the CEC; and 3) advice on specific components of the proposed CEC 2001-2003 Program Plan.

#### CEC Meeting in Dallas

The GAC sincerely appreciates the leadership exercised by EPA Administrator Carol Browner at the last CEC meeting in Dallas on June 11-13, 2000, especially related to Articles 14 and 15. The GAC and NAC also greatly appreciated the opportunity to meet directly with Administrator Browner to discuss issues of concern.

The format of the Dallas meeting was much improved over previous meetings. The theme-based presentations were of higher quality and the public comment session was better organized. We appreciate the efforts of your staff at EPA and of the CEC staff for acting on previous advice and instituting these and other improvements. The GAC recommends that meeting organizers continue to build on these improvements as planning gets underway for the meeting in Mexico next year. We also recommend that the three NACs and GAC continue to meet jointly and with the JPAC, and that the CEC seek advance input on how to organize meeting events so that the format and subject matter are accessible and relevant to appropriate audiences.

#### Future Direction of the CEC

We urge the CEC to develop a long-range (4-6 years) strategic plan. This plan should be updated every 2-3 years. The mission and goals should be revisited, perhaps at a retreat, with more public input into the process. Obviously, the workplan should be adjusted as necessary to reflect the goals, objectives and priorities of this strategic plan.

In a similar vein, we strongly recommend that the CEC develop a communications/outreach/marketing plan. The plan should provide for publicizing CEC accomplishments and help communicate the value of the CEC. Materials produced should be geared

to public consumption and tailored to specific audiences. The annual report should be more consumer-friendly, as should its presentation at the Ministerial. To help raise the visibility of CEC=s successes, NAFEC grantees should be required to produce Ashow and tell@ products that enhance transferability and demonstrate the value of the projects that the CEC funds under this program.

Finally, the GAC wishes to underscore the need for adequate funding for CEC institutions if the Commission is to function effectively. Level funding of the CEC over the years actually is a funding cut, and yet the responsibilities of CEC staff and consultants have increased. JPAC=s funding needs should be monitored given its potential increased responsibilities for public review under the Articles 14,15 process. In addition, continued funding is essential for NAFEC. Project results from NAFEC grants should become an integral part of the CEC marketing/outreach program. The benefits associated with these grants need to be better articulated. Potential partnerships with the private sector and foundations should be explored.

Our concern about funding also relates to the NAC and GAC. As you know, the GAC and the NAC continue to rely on administrative support from EPA to fulfill their role of providing multi-stakeholder-based guidance. From GAC=s perspective, continued adequate funding and resource support is a key to enabling the committees to function optimally and to fostering full participation from EPA programs and regions. In our view, the NAC/GAC role will take on special significance in the coming year during the transition from one U.S. political administration to the next.

#### Comments on Proposed CEC Workplan

Before commenting on the Workplan, the GAC wishes to make clear its deep concern about the lack of CEC presence at its meetings. Although a couple of CEC staff members phoned in to the meeting, which was informative, there was little opportunity to interact and raise questions for clarification during committee deliberations later in the meeting. This lack of presence was especially detrimental to the GAC=s discussion about the proposed workplan for 2001-2003. Board members had a number of questions that could not be answered, and this lack of information hampered discussion. Therefore, the comments below are somewhat limited. We strongly urge the CEC to have a strong presence at future GAC meetings so that GAC members can question CEC staff, thereby enhancing the value of our advice. In fairness to CEC staff, we feel that the CEC=s inadequate budget is the root of this problem.

The GAC is pleased to note that the workplan incorporates previous recommendations, including components such as progress to date and expected outcomes. We appreciate the CEC's continued receptivity to GAC suggestions. On a broader level, we recommend that the plan be aligned with a longer-range strategic plan (as recommended above).

Comments on specific sections follow:

**Environment, Economy and Trade:** For the Green Goods and Services Project, the GAC advises that a broader strategy be instituted so that a more comprehensive project can take the place of the current product-by-product approach. At the same time, the CEC should continue to exercise its critical role as facilitator on environmental labeling issues. Many states are engaged in environmental labeling regulations, and the CEC can play an important role in helping to harmonize these efforts on a tri-national basis. EPA also should pay more attention to this issue on a national level. Future topics for this work group also may include issues such as genetics.

**Biodiversity and Ecoregions:** The GAC recommends that the work on marine-protected areas include a link to fisheries. The work also should incorporate additional water resources such as the Gulfs of Mexico, California, and Maine. Generally speaking, the GAC requests that it be more fully briefed on the concept of ecoregions and suggests that EPA set up a meeting to focus on this topic.

**Pollutants and Health:** The GAC strongly encourages the CEC to continue its work in this area, especially in areas such as dioxin, SMOC, and air transport studies.

**Children's Health:** In the GAC's view, JPAC's proposed meeting of the Health and Environment Ministers within the next two years would be premature. Instead, more groundwork should be laid first in order to more fully understand circumstances in each of the countries and identify common issues.

**Transportation Corridors:** To fully support CEC's work on transportation corridors, stronger efforts should be made to explore partnerships with DOT and other agencies that have a stake in the issue and who have significant resources which can be applied to this effort.

**Law and Policy:** The GAC commends the work carried out on Environmental Management Systems and views the project as a tool for demonstrating the value of EMS. We strongly support the enforcement and compliance component of this work.

Honorable Carol M. Browner  
October 18, 2000  
Page 4

Finally, the GAC urges the U.S. government to help ensure that the CEC retains its highly capable senior staff who have earned the respect of NAC, GAC and JPAC members and who have made a significant contribution to improved environmental quality on the North American continent.

Thank you for giving us the opportunity to serve on the Governmental Advisory Committee, and thank you for the opportunity to serve as Chairman of the GAC over the past four years. Please contact me if you have any questions or concerns regarding our report. We look forward to your response.

Sincerely,

Robert Varney, Chair  
Governmental Advisory Committee